

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER R. CRANE, JR.,

Plaintiff,

- VS -

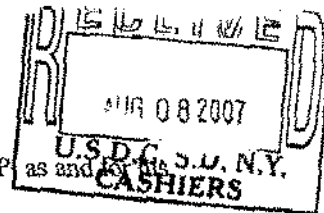
POETIC PRODUCTS LIMITED,

Defendant.

JUDGE JONES

COMPLAINT

07 CIV 7063



Plaintiff, Roger R. Crane, Jr., by his attorneys, Nixon Peabody LLP,

as and by its S.D. N.Y.

Complaint against Poetic Products Limited, alleges as follows:

**NATURE OF THIS ACTION**

1. *The Last Confession*, a play authored by New York attorney Roger R. Crane, Jr. ("Crane"), is currently celebrating success in London, England, where it opened this year to rave reviews from critics and theatre-goers alike. The play is a historical mystery thriller surrounding the death of Pope John Paul I. The Pope's untimely death is renowned, and was of acute public interest in the late 1970's and early 1980's. In 1978, thirty-three days after his election, Pope John Paul I was dead. No official investigation was conducted, no autopsy was performed, and the Vatican's press release about the cause of death was found to be largely false. Mr. Crane's play is a gripping thriller that goes behind the scenes at the 1978 Vatican, uncovering the bitter rivalries, the political maneuverings and the unspoken crises of faith that surrounded the death of Pope John Paul I.

2. Defendant Poetic Products Limited ("PPL") is the copyright holder to a book authored by David Yallop entitled *"In God's Name: An Investigation Into The Murder of Pope*

*John Paul I* ("In God's Name"). *In God's Name* is a self-proclaimed "classic work of investigative writing" about the death of Pope John Paul I. According to its preface, *In God's Name* was a product of nearly three years of research, and states that the reader should be assured that "all the information, all the details, all the facts, have been checked and double checked to the extent multiple sources were available."

3. While both *In God's Name* and *The Last Confession* focus on the mysterious death of Pope John Paul I, and, as such, share some common facts and some common conclusions, Yallop's book bears little resemblance to Crane's play. Nonetheless, PPL, through its counsel, claims that *The Last Confession* infringes *In God's Name*, threatens to sue Crane for copyright infringement, and has through correspondence, placed a cloud on the ownership rights of Crane in *The Last Confession*.

4. Apart from elements common to historical and religious facts and beliefs surrounding Pope John Paul I's death, *The Last Confession* is not substantially similar to *In God's Name*. There is no basis for PPL's claims of infringement, and Crane has filed this declaratory judgment action in order to resolve this dispute and obtain a declaration that *The Last Confession* does not infringe PPL's copyright or any other interests in *In God's Name*.

#### PARTIES

5. Plaintiff Crane is an attorney who resides and practices law in New York, and is the author and exclusive copyright owner of *The Last Confession*. A certificate of registration for Crane's *The Last Confession*, Registration No. TX-4-640-311, is annexed hereto as Exhibit A. Crane holds another copyright registration for a shorter, revised version of *The Last Confession*, Registration No. PAu-2-801-288. The U.S. Copyright Office Record for this registration is annexed hereto as Exhibit B.

6. Upon information and belief, defendant PPL is a private company with a principal place of business at 58-60 Berners Street, London, England.

7. Upon information and belief, PPL is the copyright holder of the book *In God's Name*, authored by David Yallop.

8. PPL registered *In God's Name* with the United States Copyright Office, Registration Number TX-1-499-279.

9. *In God's Name* is published by Carroll & Graf Publishers, an imprint of Avalon Publishing Group, Inc., located at 245 West 17th Street, 11th Floor, New York, NY 10011, and is for sale in bookstores in New York City, and can also be purchased in New York and elsewhere via the internet.

#### JURISDICTION AND VENUE

10. Crane seeks a declaration of his rights pursuant to 28 U.S.C. §§ 2201(a) and 2202, in order to resolve an actual controversy within this Court's jurisdiction between the parties. Subject matter jurisdiction exists pursuant to 28 U.S.C. §§ 1331, 1332(a)(2) and 1338(a).

11. This Court has personal jurisdiction over PPL pursuant to N.Y. CPLR 302(a)(1) because, among other things, PPL, through its agent publisher located in New York City, is offering *In God's Name* for sale within the state of New York.

12. Venue is proper in this District pursuant to 28 U.S.C. § 1391.

#### THE CONTROVERSY BETWEEN THE PARTIES

13. On multiple occasions in June and July, 2007, PPL sent correspondence to Crane asserting that *The Last Confession* infringes PPL's copyright in *In God's Name*, and has communicated expressly to the publisher, director and producers of Crane's play that the play constitutes infringement and has threatened to seek accounting and damages based on any

likely profits from future productions of *The Last Confession* or revenues received from film rights.

14. Crane responded to the letters, stating that Crane's *The Last Confession* does not infringe *In God's Name*.

**FIRST CAUSE OF ACTION  
(DECLARATORY JUDGMENT PURSUANT TO 28 U.S.C. § 2201(a))**

15. The allegations of Paragraphs 1 through 14 are realleged as if fully set forth herein.

16. The dispute created by PPL's claims of copyright infringement is an actual, substantial and justiciable controversy between the parties requiring resolution by the Court.

17. PPL contends that Crane copied *In God's Name*, and that Crane's *The Last Confession* infringes PPL's copyright for the same, and has expressly stated its claims for damages, an account of profits in respect to infringements of its copyright, and a right to seek preliminary injunctive or other relief.

18. Crane contends that the two works are not substantially similar, that any similarities are between the works are similarities between unprotectable elements of the works, and further contends that any use made by Crane of *In God's Name* was a fair use pursuant to 17 U.S.C. § 107.

19. Crane has no adequate remedy at law.

**WHEREFORE**, Crane demands the following judgment:

1. A declaration that Crane's authorship, publication and exploitation of rights in and to *The Last Confession* has not in any way infringed the copyright of PPL or any person or entity owning rights to *In God's Name* or any prior edition or version of the work, or otherwise violated any rights of PPL.

2. An award of attorneys fees in connection with this action.
3. For such other relief as the Court deems just.

Dated: August 8, 2007

NIXON PEABODY LLP

By: 

Frank H. Penski (FP 9221)  
Tamar Y. Duvdevani (TD 7603)  
437 Madison Avenue  
New York, New York 10023  
(212) 940-3000

*Attorneys for Plaintiff*  
*Roger R. Crane, Jr.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER R. CRANE, JR.,

Plaintiff,

- vs -

POETIC PRODUCTS LIMITED,

Defendant.

Civil No. 07 CV 7063 (BSJ)

COMPLAINT  
EXHIBIT A

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## CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*  
REGISTER OF COPYRIGHTS  
United States of America

## FORM TX

UNITED STATES COPYRIGHT OFFICE

REGISTRATION

TX 4-640-311



1 TX / TXU  
EFFECTIVE DATE OF REGISTRATION  
Oct. 1 1997  
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

## TITLE OF THIS WORK

John Paul The Last Confession of Cardinal Giovanni Benilli

## PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

2

## NAME OF AUTHOR

a Roger R. Crane, Jr.

## DATES OF BIRTH AND DEATH

Year Born 03/28/46 Year Died

Was this contribution to the work a "work made for hire"?  
☐ Yes  
☒ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country  
OR Citizen of U.S.A.  
Domiciled in

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

## NOTE

Under the law, the "author" of a

## NATURE OF AUTHORSHIP

Text Briefly describe nature of the material created by this author in which copyright is claimed.

## NAME OF AUTHOR

b

## DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?  
☐ Yes  
☒ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country  
OR Citizen of  
Domiciled in

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

## NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

## NAME OF AUTHOR

c

## DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?  
☐ Yes  
☒ No

## AUTHOR'S NATIONALITY OR DOMICILE

Name of Country  
OR Citizen of  
Domiciled in

## WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

## NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

3

## YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1997 Year

## DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.  
Month 8 Day 5 Year 1997

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Roger R. Crane, Jr.  
c/o Bachner, Tally, Polevoy & Misher LLP  
380 Madison Avenue  
New York, NY 10017-2590

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

## APPLICATION RECEIVED

OCT 01 1997

## ONE DEPOSIT RECEIVED

OCT 01 1997\*

## TWO DEPOSITS RECEIVED

## REMITTANCE NUMBER AND DATE

## MORE ON BACK

\* Complete all applicable spaces (numbers 5-10 on the reverse side of this page).  
\* See detailed instructions.  
\* Sign the form at line 10.

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Page 1 of 2 pages



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special relief granted under CFR 202.20 (d).

EXAMINED BY <u>MS</u>	FORM TX
CHECKED BY _____	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> DEPOSIT ACCOUNT FUNDS USED	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ☐☐ This is the first published edition of a work previously registered in unpublished form.☒ This is the first application submitted by this author as copyright claimant.☐ This is a changed version of the work, as shown by space 6 on this application.If your answer is "Yes," give: Previous Registration Number ☐Year of Registration ☐

DERIVATIVE WORK OR COMPILATION Complete both space 6a &amp; 6b for a derivative work; complete only 6b for a compilation.

a. Paraphrasing Material Identify any preexisting work or works that this work is based on or incorporates. ☐b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ☐

MANUFACTURERS AND LOCATIONS If this is a published work consisting predominantly of nondramatic literary material in English, the law may require that the copies be manufactured in the United States or Canada for full protection. If so, the names of the manufacturers who performed certain processes, and the places where these processes were performed must be given. See instructions for details.

Names of Manufacturers ☐Places of Manufacturers ☐

REPRODUCTION FOR USE OF BLIND OR PHYSICALLY HANDICAPPED INDIVIDUALS

A signature on this form at space 10, and a check in one of the boxes here in space 8, constitutes a non-exclusive grant of permission to the Library of Congress to reproduce and distribute solely for the blind and physically handicapped and under the conditions and limitations prescribed by the regulations of the Copyright Office: (1) copies of the work identified in space 1 of this application in Braille (or similar tactile symbols); or (2) phonorecords embodying a fixation of a reading of that work; or (3) both.

☐ Copies and Phonorecords☐ Copies Only☐ Phonorecords OnlyDEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. Name ☐Account Number ☐CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/Zip ☐

Roger R. Crane, Jr.

c/o Bachner, Tally, Polevoy &amp; Misher LLP

380 Madison Avenue

New York, NY 10017-2590 Area Code & Telephone Number ☐ (212) 687-7000

CERTIFICATION I, the undersigned, hereby certify that I am the

Check one ☒☒ Author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ☐Typed or printed name and date ☐ If this is a published work, this date must be the same as or later than the date of publication given in space 3.

Roger R. Crane, Jr.

date ☐

9/17/97

Handwritten signature (X) ☐MAIL  
CERTIFICATE  
DATE TOCertificate  
will be  
mailed by  
first-class  
mail

Name ☐ Roger R. Crane, Jr.  
c/o Bachner, Tally, Polevoy & Misher LLP

Number/Street Apartment Number ☐

380 Madison Avenue

City/State/Zip ☐

New York, NY 10017-2590

Name your:

- Completed all necessary spaces?
- Signed your application in space 10?
- Enclosed check or money order for \$35 payable to Registrar of Copyrights?
- Enclosed your deposit material with the application and fee?

MAIL TO: Registrar of Copyrights,  
Library of Congress, Washington,  
D.C. 20540.

17 U.S.C. § 501(c). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statements filed in connection with the application, shall be fined not more than \$2,500.

U.S. GOVERNMENT PRINTING OFFICE: 1988-491-580/20,016

February 1988-305,002

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14-08-2008

12:00

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER R. CRANE, JR.,

Plaintiff,

- vs -

POETIC PRODUCTS LIMITED,

Defendant.

Civil No. 07 CV 7063 (BSJ)

**COMPLAINT  
EXHIBIT B**

U.S. Copyright Office Search Records Results

**Copyright | Search Records Results**

Registered Works Database (Title Search)

**Search For:** LAST CONFESSION*1 Item***For a list of commonly used abbreviations that appear in the catalog record, click here.**

1. Registration Number: PAU-2-801-288

Title: The last confession.

Description: 116 p.

Note: A play.

Claimant: acRoger R. Crane , Jr., 1946-

Created: 1997

Registered: 7Oct03

Title on © Application: John Paul; The last confession of Cardinal Giovanni Benelli.

Previous Related Version: Prev. reg. 1997, TX 4-640-311.

Claim Limit: NEW MATTER: additions &amp; revisions.

Special Codes: 3/D

[Home](#) | [Contact Us](#) | [Legal Notices](#) | [Freedom of Information Act \(FOIA\)](#) | [Library of Congress](#)U.S. Copyright Office  
101 Independence Ave. S.E.  
Washington, D.C. 20559-6000  
(202) 707-3000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SUMMONS IN A CIVIL ACTION

ROGER R. CRANE, JR.,

Plaintiff

CASE NUMBER

-against-

**07 CIV 7063**

POETIC PRODUCTS LIMITED,

Defendant

JUDGE JONES

To:

Poetic Products Limited  
58-60 Berners Street  
London, England W1T 3JS

**YOU ARE HEREBY SUMMONED** and required to file with the Clerk of the Court and serve upon Plaintiff's attorney:

Frank H. Penski, Esq.  
NIXON PEABODY LLP  
437 Madison Avenue  
New York, New York 10022

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

CLERK

*Manos Zimistero*

BY DEPUTY CLERK

AUG 08 2007

DATE

## **EXHIBIT B**

Tamara Carmichael  
Christelette A. Hoey  
Joshua Krumholz (*Pro Hac Papers to be Submitted*)  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, New York 10007  
(212) 513-3200

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

ROGER R. CRANE, JR., : 07 CV 7063 Judge Jones

Plaintiff, :

**ANSWER; COUNTERCLAIMS AND  
DEMAND FOR JURY TRIAL**

-against- :

:

:

POETIC PRODUCTS LIMITED,

Defendant. :

-----X

Defendant, Poetic Products Limited ("Poetic Products") hereby answers the allegations in the Complaint filed by Plaintiff Roger R. Crane, Jr. ("Crane"), asserts its affirmative defenses, and asserts counterclaims for copyright infringement and unfair and deceptive trade practices.

**I. ANSWER**

For its Answer, Poetic Products hereby states:

**NATURE OF THIS ACTION**

1. Poetic Products admits that Crane authored a play entitled "The Last Confession" (the "Play") and that Crane is a New York attorney. Poetic Products further admits that the Play was performed in the UK at the Theatre Royal, Haymarket, London from late June 2007 until

approximately September 2007 subsequent to its first public performance at the Chichester Festival Theatre, Chichester, England in early May 2007, and thereafter at various locations in England until its transfer to London in early June 2007. The reviews of the Play were mixed, some positive, others not. Poetic Products admits that Pope John Paul I's death in 1978 was untimely, occurring 33 days after his election as Pope, and that his death was of public knowledge and interest at the time and subsequently and continues to be of public interest. Poetic Products admits that no official Vatican investigation was conducted into the Pope's death, no autopsy was performed and the Vatican's press release about the cause of death was, in David Yallop's view as expressed in "In God's Name," false. The reminder of this paragraph is denied.

2. Poetic Products admits it holds the copyright to a book authored by David Yallop entitled "In God's Name: An Investigation Into The Murder of Pope John Paul I" ("In God's Name"). Poetic Products admits as to the most recent edition of In God's Name published in 2007, that it is stated that on the cover that the book is a "classic work of investigative writing whose revelation will continue to reverberate around the world." Poetic Products admits the allegation in paragraph 2 regarding the preface of In God's Name and that it states "all the information, all the details, all the facts, have been checked and double checked to the extent multiple sources were available. [David Yallop] take[s] the responsibility for putting the evidence together and for the conclusions reached."

3. Poetic Products admits that it claims The Last Confession infringes In God's Name. Poetic Products admits that the parties were involved in pre-suit communications in the UK with respect to Crane's infringement in that country. Poetic Products otherwise denies the remaining allegations in paragraph 3 of the Complaint.

4. Poetic Products denies that *The Last Confession* is not substantially similar to *In God's Name* and that Poetic Products has no basis for claiming infringement. Poetic Products is without sufficient knowledge or information to form a belief as to the truth of the allegations regarding Crane's motivation or purpose in filing this action as stated in paragraph 4 of the Complaint and, therefore, Poetic Products denies same.

#### **PARTIES**

5. Poetic Products admits that Crane is an attorney who practices law in New York, and that the face of the certificates of registration for "*The Last Confession*," Registration No. TX-4-640-311 and Registration No. PAu-2-801-288 indicate the copyrights were issued to Crane. Poetic Products is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in paragraph 5 of the Complaint and, therefore, denies them.

6. Poetic Products admits it is a private company incorporated under the laws of England and Wales with its registered office at 58-60 Berners Street, London, England.

7. Poetic Products admits it holds a U.S. and UK copyright to the book "*In God's Name*" which book is authored by David Yallop.

8. Poetic Products admits that it registered "*In God's Name*" with the United States Copyright Office, Registration Number TX-1-499-279.

9. Poetic Products admits "*In God's Name*" is published by "Carroll & Graf," an imprint of Avalon Publishing Group, Inc., located at 245 West 17th Street, 11th Floor, New York, New York 10011 and that "*In God's Name*" is sold in bookstores in New York City, and may be purchased in New York and elsewhere via the Internet.



### **JURISDICTION AND VENUE**

10. The allegations in paragraph 10 are legal conclusions to which no response is required. To the extent paragraph 10 contains any factual allegations, Poetic Products denies them.

11. Poetic Products denies the allegations in paragraph 11.

12. The allegations in paragraph 12 are legal conclusions to which no response is required. To the extent paragraph 12 contains any factual allegations, Poetic Products denies them.

### **THE CONTROVERSY BETWEEN THE PARTIES**

13. Poetic Products admits Crane has authored a play entitled "The Last Confession", which infringes Poetic Products' registered U.S. copyright in "In God's Name," and to that extent Crane is infringing Poetic Products' rights and unlawfully and unfairly competing with Poetic Products. Poetic Products also admits it has taken lawful and appropriate steps in the UK to protect its valuable UK copyright in "In God's Name, including asserting its entitlement to relief with respect to infringement of such copyright by Crane. Poetic Products otherwise denies the allegations in paragraph 13, and specifically denies that the alleged communications occurred with respect to Poetic Products' registered U.S. Copyright.

14. Poetic Products admits Crane responded to Poetic Products' allegations of infringement by stating "The Last Confession" does not infringe "In God's Name" under UK copyright law.

### **FIRST CAUSE OF ACTION (DECLARATORY JUDGMENT PURSUANT TO 28 U.S.C. § 2201(a))**

15. Poetic Products hereby repeats and asserts its responses to paragraphs 1 through 14 as if fully set forth herein.

16. Poetic Products denies the allegations in paragraph 16 of the Complaint.

17. Poetic Products admits Crane has authored a play entitled "The Last Confession," which infringes Poetic Products' registered U.S. copyright in "In God's Name," and to that extent Crane is unlawfully and unfairly competing with Poetic Products. Poetic Products also admits it has taken lawful and appropriate steps to protect its valuable rights in its UK copyright and in its work "In God's Name." The remainder of paragraph 17 is denied.

18. Poetic Products denies the allegations in paragraph 18 of the Complaint.

19. The allegations in paragraph 19 of the Complaint are legal conclusions to which no response is required. To the extent paragraph 19 contains any factual allegations, Poetic Products denies them.

### **AFFIRMATIVE DEFENSES**

#### **FIRST DEFENSE**

The Complaint fails to state a claim upon which relief may be granted.

#### **SECOND DEFENSE**

The Complaint is barred because Crane fails to state his claims with particularity, thereby barring Poetic Products from ascertaining the true and factual nature of Crane's claims and depriving Poetic Products from defending against the Complaint.

#### **THIRD DEFENSE**

Crane's claims are barred by the doctrine of unclean hands.

#### **FOURTH DEFENSE**

Crane's claims are barred by the doctrine of estoppel.

#### **FIFTH DEFENSE**

The Complaint fails to allege a justiciable case and controversy as required by the Declaratory Judgment Act.

#### **SIXTH DEFENSE**

Poetic Products reserves the right to amend its affirmative defenses as warranted by discovery and additional information learned in this case.

WHEREFORE, Poetic Products Limited asks that this Court enter judgment in favor of Poetic Products, dismiss Plaintiff's claims against Poetic Products, and award Poetic Products its attorney's fees and costs incurred in connection with defending this action, plus any and all other relief this Court deems just and proper.

#### **II. COUNTERCLAIMS**

Defendant/counter-plaintiff, Poetic Products Limited, sues plaintiff/counter-defendant, Roger R. Crane, Jr., and alleges:

#### **PARTIES**

1. Defendant/counterclaim-plaintiff Poetic Products Limited ("Poetic Products") is a foreign corporation incorporated under the laws of England and Wales with its registered office at 58-60 Berners Street, London, England.

2. Upon information and belief, plaintiff/counter-defendant Roger R. Crane, Jr. ("Crane") is an attorney who practices law in New York, New York.

#### **JURISDICTION AND VENUE**

3. This Court has subject-matter jurisdiction over Poetic Products' claims for copyright infringement and related claims pursuant to 17 U.S.C. § 101 et seq. This Court has jurisdiction over this action under 28 U.S.C. § 1331 and 28 U.S.C. § 1338. This Court has

supplemental jurisdiction over Poetic Products' state law claims under the doctrine of supplemental jurisdiction.

4. Venue is proper in the Court, pursuant to 28 U.S.C. §§ 1391(b) and 1400(a), because (a) the acts of infringement and other wrongful conduct alleged occurred in this District and (b) Crane may be found in this District.

#### **FACTUAL ALLEGATIONS**

5. Poetic Products holds and licenses rights to a published book authored by David Yallop entitled "In God's Name: An Investigation into the Murder of Pope John Paul I" (the "Work").

6. Poetic Products owns the exclusive rights to the Work. It holds a valid U.S. copyright in the Work that was duly and properly registered with the United States Copyright Office, bearing the Registration Number TX-1-499-279. See Exhibit A.

7. In the UK, Crane (himself, through his agents or by others who acted on his behalf) engaged in conduct, and/or authorized conduct, including the advertising, marketing, promotion, performance and publication of a script and/or other works that infringe Poetic Products' Work namely, a play entitled "The Last Confession" (the "Play"). Such conduct and/or the authorization of such conduct, infringed Poetic Products' UK copyright in In God's Name. The Play was published in the UK and performed in theaters in the UK.

8. As a result of Crane's infringing acts in the UK, on or about June 18 and 22, 2007, Poetic Products notified Crane by letters from Poetic Products' English lawyers to Crane's English agent and English lawyers that Crane's Play and acts within the UK infringe Poetic Products' UK intellectual property rights.

9. In response to this written notice regarding breach of the UK copyright, Crane (through his English lawyers) denied that his Play infringes Poetic Products' UK copyright.

10. The similarities between In God's Name and the Play have been noted publicly as demonstrated, *inter alia*, by the following UK press reports:

(a) In an article published in the London Evening Standard newspaper of June 19, 2007 which reported on an interview with the famous lead actor in the English production of the play, David Suchet, it was stated that "The Last Confession is based on David Yallop's book In God's Name, which has already sold more than six million copies...". It is to be assumed that the author of the article, Fiona Maddocks, based that statement upon information provided to her by David Suchet. Such assumption is based in part upon Mr. Suchet's statement, quoted in the article, that "I first got involved with the play some five years ago, and spent some time working on the script with Robert (sic) Crane", indicating that his knowledge is based upon participation in the writing of the script, in addition to his playing the lead role and having carried out research in preparation for that role. See Exhibit B.

(b) In the London published "Big Issue" magazine for the week of July 16-22 2007, a review of the Play stated "His [John Paul 1's] early demise has given rise to conspiracy theories aplenty, and David Yallop's multi-million-selling book, In God's Name, on which this new play by Roger Crane is based". See Exhibit C.

11. Upon information and belief, Crane has also committed and/or is continuing to commit acts of copyright infringement against Poetic Products in the U.S., which acts are the subject of this Counterclaim. More specifically, the infringing Play was authored in the U.S. and Crane has published and marketed the Play and/or continues to do so in this country. As a result,

Poetic Products has been damaged and suffered irreparable injury through, *inter alia*, Crane's past copyright infringement of the Work and/or new and future infringements; lost profits and/or opportunities; and damage to Poetic Products' goodwill and reputation. The full extent of Crane's infringement and the resulting damages is not yet known. Crane's conduct has been willful, or, at a minimum, should have known that his actions constitute infringement. Therefore, Crane has been willfully blind and has acted in reckless disregard of Poetic Products' Work and U.S. registered copyright.

12. Poetic Products brings this Counterclaim to restrain and enjoin Crane from his continuing infringement of Poetic Products' rights in the Work in the U.S. Poetic Products further seeks to recover monetary damages as compensation for the harm that it has suffered as a result of Crane's wrongful conduct.

**COUNT I**  
**(Copyright Infringement)**

13. Poetic Products realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 12 of this Counterclaim.

14. Poetic Products is the sole owner of the Work and the corresponding U.S. copyright and Certificate of Registration.

15. Crane has infringed the U.S. copyright in the Work by authoring and/or reproducing an infringing work, and further by marketing, promoting and/or distributing infringing materials in the U.S. without approval or authorization from Poetic Products.

16. As a result of Crane's conduct, he is liable to Poetic Products for copyright infringement. See 17 U.S.C. § 501. Poetic Products has suffered and continues to suffer damages. Poetic Products is entitled to recover its damages, which include any and all profits

Crane has made as a result of his wrongful conduct. See 17 U.S.C. § 504. Alternatively, Poetic Products is entitled to statutory damages under 17 U.S.C. § 504(c).

17. In addition, Crane's infringement has been willful within the meaning of the Copyright Act. At a minimum, Crane has acted with willful blindness to and in reckless disregard of Poetic Products' registered copyrights. Accordingly, the award of statutory damages should be enhanced in accordance with 17 U.S.C. § 504(c)(2).

18. Poetic Products is also entitled to injunctive relief, pursuant to 17 U.S.C. § 502, and to an order impounding any and all infringing materials, pursuant to 17 U.S.C. § 503. Poetic Products has no adequate remedy at law for Crane's wrongful conduct because, among other things:

(a) The Work and Poetic Products' copyright is unique and valuable property that has no readily determinable market value;

(b) Crane's infringement harms Poetic Products such that Poetic Products could not be made whole by any monetary award; and

(c) Crane's wrongful conduct and the resulting damage to Poetic Products is continuing.

19. Poetic Products is also entitled to recover its attorneys' fees and costs of suit. See 17 U.S.C. § 505.

**COUNT II**  
**(Common Law Unfair Competition)**

20. Poetic Products realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 12 of this Counterclaim.

21. Crane's acts and conduct, as alleged above, constitute unfair competition under applicable common law.



22. Crane's acts and conduct are likely to cause confusion and mistake among customers and the public as to the origin or association of Crane's infringing Play. These acts and conduct are likely to lead the public to conclude, incorrectly, that Crane's infringing Play originates with, is sponsored by, or is authorized by Poetic Products, to the damage and harm of Poetic Products and the public.

23. Crane's acts and conduct, as alleged above, has damaged and will continue to damage Poetic Products and has resulted in losses to Poetic Products and an illicit gain of profit to Crane in an amount that is unknown at the present time.

**PRAYERS FOR RELIEF**

WHEREFORE, Poetic Products respectfully requests judgment against Crane as follows:

(A) That the Court enter a judgment finding:

(i) that Crane has infringed Poetic Products' exclusive rights in Certificate of Copyright Registration No. TX-1-499-279, in violation of 17 U.S.C. § 501;

(ii) that Crane has engaged in unfair methods of competition in violation of applicable common law;

(iii) that Crane has otherwise injured the business reputation and business of Poetic Products by the acts and conduct set forth in this Counterclaim; and

(iv) that Crane's acts were willful.

(B) That the Court issue injunctive relief against Crane, and that Crane, his principals, directors, officers, agents, representatives, servants, employees, attorneys, successors and assigns, and all others in active concert or participation with Crane, be enjoined and restrained from continued and future infringement of the Work.

(C) That the Court order Crane to pay Poetic Products damages as follows:



(i) Poetic Products' damages and Crane's profits pursuant to 17 U.S.C. § 504(b), or in the alternative, enhanced statutory damages pursuant to 17 U.S.C. § 504(c)(2), for Crane's willful infringement; and

(ii) Poetic Products' damages and Crane's profits pursuant to applicable common law.

(D) That the Court order Crane to pay Poetic Products both the costs of this action and the reasonable attorneys' fees incurred by Poetic Products in prosecuting this action; and

(E) That the Court grant Poetic Products such other and additional relief as is just and proper.

**JURY DEMAND**

Poetic Products demands a jury trial on all claims so triable.

Respectfully Submitted,

HOLLAND & KNIGHT LLP

By: 

Tamara Carmichael  
Christelette Hoey  
Joshua Krumholz (*Pro Hac Papers  
to be Submitted*)  
195 Broadway, 24<sup>th</sup> Floor  
New York, New York 10007  
(212) 513-3200 (telephone)  
(212) 385-9010 (fax)

# 4835561\_v6

Exhibit A

# FORM TX

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

TX: 1-499-279

EFFECTIVE DATE OF REGISTRATION

12 3 84  
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

1

IN GOD'S NAME

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

Published in a periodical or serial give: Volume Number Issue Date On Pages

NAME OF AUTHOR

a Poetic Products Ltd. (Employer for hire of David A. Yellon)

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of

Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK?

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes," the answer to this question is "No."

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

Entire Work except photographs

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of

Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK?

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes," the answer to this question is "No."

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of

Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK?

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes," the answer to this question is "No."

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

This information must be given in all cases.

1984

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if not made available to the public.

Month Day Year U.S.A.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Poetic Products Ltd. c/o Jonathan Cape Ltd.  
30 Bedford Square  
London WC1B 3EL ENGLAND

APPLICATION RECEIVED

03 DEC 1984 8800 1985

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

03 DEC 1984

REMARKS NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 3 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

NOTE ON BACK: 1. Complete all numbered spaces 2-14 on your reverse side of this page.

DO NOT WRITE

TX 1-499-279

EXAMINED BY	FORN EX
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> DEPOSIT ACCOUNT FUNDS USED	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- ☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ☐
- ☐ This is the first published edition of a work previously registered in unpublished form.
- ☐ This is the first application submitted by this author as copyright claimant.
- ☐ This is a changed version of the work, as shown by space 4 on this application.
- If your answer is "Yes," give Previous Registration Number  Year of Registration

**DERIVATIVE WORK OR COMPILATION** Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporated. b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. **MANUFACTURERS AND LOCATIONS** If this is a published work consisting preponderantly of nondramatic literary material in English, the law may require that the copies be manufactured in the United States or Canada for full protection. If so, the names of the manufacturers who performed certain processes, and the places where these processes were performed must be given. See instructions for details.Name of Manufacturer 

Fairfield Graphics

Place of Manufacture 

Fairfield, PA

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- ☒ Copies and Phonorecords ☐ Copies Only ☐ Phonorecords Only

**DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent. Name/Address/Attn/City/State/Zip 

Nancy Kenney c/o Bantam Books

Free Code 5 Telephone Number 800 223-6834

**CERTIFICATION** I, the undersigned, hereby certify that I am theCheck one ☐

- ☐ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

☒ authorized agent of Poetic Products Ltd.Name of author or other copyright claimant, or owner of exclusive right(s) Typed or printed name and date  If this is a published work, this date must be the same as or later than the date of publication given in space 3

Nancy Zoole Kenney

Date  11/1/84

Signature (X)

*Nancy Zoole Kenney*

Name of Copyright Owner

Copyright Owner's Address

Name

Bantam Books, Inc. (Attn: N.Z. Kenney)

Address/Street/Apartment Number

666 Fifth Avenue

City/State/Zip

New York, New York 10101

Check one:

☐ Completed an enclosure application?

☐ Signed your application in space 9?

☐ Enclosed check or money order for \$10 payable to Registrar of Copyrights?

☐ Enclosed your deposit material with this application and fee?

With This Register of Copyrights Library at Congress, Washington D.C. 20540

U.S. Copyright Office: 1709 Constitution Avenue, N.W., Washington, D.C. 20540

1-800-223-6834

Exhibit B



EVENING STANDARD

LIFE &amp; CULTURE

A thriller based on the death of Pope John Paul I could become the West End's least likely hit. The story will continue to fascinate, says its star David Suchet



FIONA  
MADDOCKS

www.thisislondon.co.uk/fionamaddocks

**P**ERHAPS it's the Da Vinci Code or Dan Brown or a fascination with Opus Dei, but I've been stunned by the amazing response," says David Suchet, star of a gripping mystery thriller about to open in the West End following rave reviews at its Chichester premiere last month. "Letters and messages have been pouring in. It's touched a nerve."

A would-be found unexpectedly dead in bed, a crisis of faith and a nest of vipers in the Vatican — these are the fantastical true-life ingredients for Roger Crane's new play *The Last Confession*, about Pope John Paul I (Albino Luciani), the "smiling" Italian who occupied St Peter's throne in 1978 for only 33 days. Just weeks after his triumph as a burly, gravel-voiced Robert Maxwell in the BBC2 drama about the late tycoon, Suchet is tackling another fact-based role that once again centres around a sudden, unexplained death.

Swathed in gorgeous scarlet, crucifix swinging, this brilliantly versatile actor plays Cardinal Benelli, who persuaded the reluctant John Paul to accept the Papacy then felt responsible for his early demise.

"At the simplest level," Suchet explains, "this is a death thriller about who murdered John Paul I, the Church's only really liberal, reforming and modernising Pope — if, indeed, he was murdered. On another, it's about one man's loss of faith, his bitterness and conviction, and a power struggle at the heart of the Catholic Church."

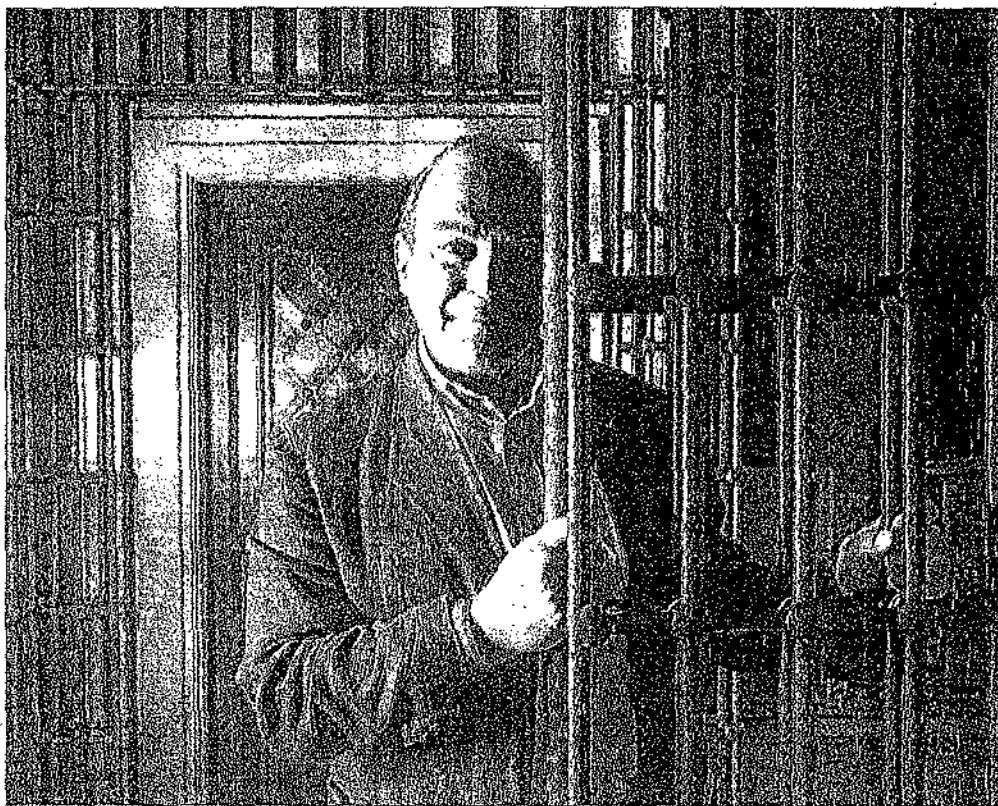
*The Last Confession* is based on David Talbot's book *Gut's Name*, which has already sold more than six million copies (and had its central tenet refuted by British journalist John Cornwell). Talbot argues that several cardinals — such as the shady Vatican banker Cardinal Marchisiani, a character in the play — stood to lose everything by John Paul's appointment.

Those men are now dead. Why did they issue false statements about the circumstances of the pope's death? Why was the body hastily embalmed, with no autopsy? As the play hints, poisoned coffee, or even sweets, may have killed him.

"Since then," Suchet comments, "we have had two such conservative popes in the Vatican. First John Paul II and now Pope Benedict. Luciani could have had a revolutionary and cataclysmic effect on Catholicism — a religion observed by around one-fifth of the world's population and now, as a result of immigration from Eastern Europe, the fastest-growing faith in the UK."

This gentle pope's death has also been linked with the mysterious fate of Roberto Calvi, "God's Banker", found hanging under Blackfriars Bridge in 1982. He made fresh headlines this month when five people were acquitted of his murder. The CIA, the Soviet Union, Freemasons, Opus Dei and the mafia all have shadowy parts in this complex plot (outlined in the film *The Godfather: Part III*). Far from being solved, these Vatican mysteries have only deepened.

Such matters fascinate Suchet. 61, younger brother of John, the Beatles-



Deadly sins: character actor David Suchet yet again proves his versatility with his role as a Vatican schemer after playing media tycoon Robert Maxwell

## Suchet's act of faith

loving newswriter, not least because of his own deeply held religious faith. Born in London of a Jewish-Lithuanian gynaecologist father and Protestant mother, he converted to Christianity some two decades ago, finally being confirmed into the Anglican Church (by the Bishop of London) last year.

"Wikipedia has me down as a Catholic and that's now been repeated everywhere but it's not the case. Likewise I'd long felt a need to explore spiritual matters. I happened to start by reading the

Letters of St Paul. Is it just chance I became a Christian? Perhaps. What if I had opened the Koran instead, or the Hebrew Bible?"

His own theological explorations have sharpened his understanding of the role of Benelli. "The issue of struggle and doubt and dogma is all too recognisable. Fanaticism scares the hell out of me. I visited Rome for the first time not long ago — just as a tourist — and was overwhelmed by the Vatican's dominance in the city. Three thousands of people in St Peter's Square kneeling down in the presence of the Pope was extraordinary."

He recently spent five days — in total silence — on retreat, at an Anglican Benedictine priory in Oxfordshire. "I didn't go because of the play. I went to pray and meditate but as much as anything, to get away from all the labour-saving devices of modern life which put us under such pressure."

Did his wife, actress Sheila Ferris, with whom he has two grown-up children, object? "Not at all. She's very supportive, and recognises it was a journey to me. No wonder that TV reality series *The Monastery* was so popular. There's a huge hunger for spiritual peace."

We meet in his powder-blue dressing room in Bath's Theatre Royal, the play's last stop before the West End. Famous for his 70 TV episodes as Agatha Christie's Belgian detective Poirot, Suchet is perhaps most recognisable for his definitive, hawkish psychos, which seem to arrive in the room ahead of the rest of him.

Affable, courteous and charismatic but far from flamboyant, he offers

while tea, green tea, stem ginger, key ingredients in a simple regime to keep a clear throat for this major role.

"I first got involved with the play some five years ago, and spent some time working on the script with Robert Crane. That's when I came to it. Suddenly David Jones came aboard. I haven't worked with him since 1975 but this is like a reunion of all the teams from our RSC days [Richard O'Callaghan, Bernard Lloyd, John Franklyn-Robbins, Charles

Suchet reveals that he plans four more Poirots for TV and to make the complete set available on DVD, but stage acting remains a first love. "The real fun for me, the gift given to me as an actor, is the chance to play such different roles." Recent appearances include *Man and Boy* and *Once in a Lifetime*, headlining a long list of credits including *Shogun* in Arundel and a dozen RSC Shakespeareans in the 1980s.

"People always ask who is the real David Suchet because I've always done character parts. I started off as a 28-year-old actor playing an octogenarian. I knew I was never going to be Gollum and the next Cary Grant. I'm short, stocky, with a deep voice and the biggest make-up bag in the business."

A Devonian resident with a passion for water (he is Chairman of the River Thames Alliance) Suchet will board the Haymarket Theatre by boat, just as Shakespearean actors were once ferried to the Globe. "I get off at Savoy Pier. One of my greatest joys is using London's Clipper river boats. Beautiful carpets, lovely seats, on the one from the Tate you can even get a cup of coffee. No traffic lights. The best way for Londoners to get about."

Each night his journey will take him under Blackfriars Bridge where, a quarter of a century ago, Roberto Calvi's body hung from a gallows, with socks and \$15,000 in his pockets. "Nothing is eternal except greed, ambition and death," remarks Suchet's character in *The Last Confession*. To that list might be added conspiracy theories.

• *The Last Confession* previews from 28 June at the Theatre Royal Haymarket. Information: 0207 3088 626.



Say a little prayer: Suchet as Cardinal Benelli in *The Last Confession*

**'The issue of struggle and doubt and dogma is all too recognisable. Fanaticism scares the hell out of me'**

Key: all of us with the chance to dress up in the finery and regalia of cardinals.

*The Last Confession* is just the latest of a string of plays to make drama out of recent history — Peter Morgan's *Frost/Nixon*, Tim Stoppard's *Rock & Roll*, not to mention works by Michael Frayn, David Hare and David Edgar as well as the Tricycle Theatre's documentary dramas such as *Guantánamo*. Why the trend?

"People are always interested in moments in history, how events came about, what made things happen. But the West End is nervous about new plays and this can defuse all the usual safety rules, having a huge cast of 15 main roles, mostly older men and only one woman, a hint."

Exhibit C



K16 ASPH  
JUL 16-22 07

BOOKS, ART AND THEATRE: ENTERTAIN

Untitled from the series Pictures From A Rubbish Tip, 1988-1989, by Keith Arnatt

## BEYOND BELIEF

### THEATRE

**THE LAST CONFESSION**  
UNTIL SEPTEMBER 15  
Haymarket Theatre

**P**ope John Paul I ruled over the Catholic Church in 1978 for just 33 days before dying in slightly suspicious circumstances. His early demise has given rise to conspiracy theories aplenty, and David Vallop's multi-million-selling book, *In God's Name*, on which this new play by Roger Crane is based. At the simplest level, it's a whodunit, a mystery that even Hercule Poirot would be pushed to solve.

I mention Agatha Christie's 'rec since, at the heart of the production, is David Suchet as one Cardinal Benelli, who makes the eponymous confession and reveals events in flashback.

A fascinating and powerful figure, he persuades the retiring Albino Luciani to become Pope John I, and after his death narrowly misses becoming pope himself, eventually having to give way to the Pole Karol Wojtyla, who became Pope John Paul II.

The short-lived pontiff was a liberal man of simplicity and humility - delightfully played by Richard O'Callaghan - whose principle aim was to take the church back to humanitarian basics. He gave the corrupt and powerful in the Vatican their marching orders, but died later on the very day that he faced up to his traditionalist opponents. Everything about his death and intentions was hushed up; there was no autopsy.

More than a thriller, this is also a play about power, faith, ambition and greed, set as it is among the politicking of the Vatican. "In the Vatican, everything is confidential and nothing is secret," remarks one character. All these red cardinals' cloaks swishing around and William Dudley's scenery of grilles and doors certainly suggest

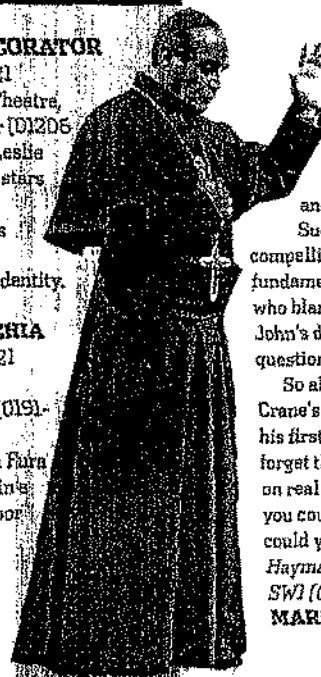
### RECOMMENDED

#### THE DECORATOR

JULY 16-21  
Mercury Theatre,  
Colchester (01206  
573948) Leslie  
Grantham stars  
in Donald  
Churchill's  
farce of  
mistaken identity.

#### NAUMACHIA

JULY 20-21  
Newcastle  
Quayside (0191-  
443 4661)  
Catalan La Fura  
dels Baus in a  
huge outdoor  
spectacle  
with 60  
acrobats.



David Suchet  
in *The Last  
Confession*

plotting and claustrophobia in David Jones' superbly acted and polished production. Suchet, in particular, is compelling as a flawed but fundamentally decent man, who blames himself for Pope John's death, and comes to question his own faith.

So absorbing is US lawyer Crane's play - surprisingly, his first - that you tend to forget that this is all based on real events. I mean, you couldn't make it up, could you?

Haymarket Theatre, London  
SW1 (0870 901 3356)  
MARK COOK

ing have entered the  
um, at 75 years old, he  
a relatively unknown gem.  
ographers' Gallery,  
Newport Street,  
EC2 (020-7833-1772,  
galleries.org.uk)  
TINGOOMER

### RECOMMENDED

#### HANGRIFFYTHS

MAY 2008

Road  
Station,  
SW7

(gov.uk/pla)

panda and a caravan  
of the sculptures  
artist has made  
Road's  
platform, the latest  
Platform For Art

#### NEONATURISTS

JULY 21

& Co, 216

Grove, London  
(020-7221 0417,  
andgallery.com)

pective of this small  
of subversives who, in  
Thatcher years,  
sat off in the name  
includes ceramics by  
Perry.

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